

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ANTHONY CLYDE HOFFMAN,

Defendant

CR. NO. 3:25 cr 33

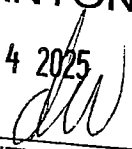
(Judge Munley)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 2251(a)
(Production of Child Pornography)

FILED
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FEB 04 2025
PER 
DEPUTY CLERK

On or about May 28, 2024, in Lackawanna County, in the Middle
District of Pennsylvania, the defendant,

ANTHONY CLYDE HOFFMAN,

did knowingly employ, use, persuade, induce, entice and coerce a minor,
MINOR VICTIM 1, to engage in sexually explicit conduct for the purpose
of producing a visual depiction of such conduct, and the visual depiction
was produced using materials that have been mailed, shipped, and
transported in and affecting interstate and foreign commerce by any
means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

THE GRAND FURTHER JURY CHARGES:

COUNT 2

18 U.S.C. § 2252(a)(4)(B)
(Possession of Child Pornography)

On or about November 18, 2024, Lackawanna County, in the Middle District of Pennsylvania, the defendant,

ANTHONY CLYDE HOFFMAN,

did knowingly possess one or more visual depictions, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict minors engaging in sexually explicit conduct, and those minors depicted had not attained twelve years of age, all of which had been shipped and transported using any means of interstate and foreign commerce, and all of which had been produced using materials which had been mailed and shipped and transported, by any means including by computer, in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offense in violation of Title 18, United States Code, Sections 2251(a), 2252(a)(2) and (a)(4)(B),

ANTHONY CLYDE HOFFMAN,

shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

By virtue of the commission of the offenses charged in Counts 1 and 2 of this Indictment by the defendant,

ANTHONY CLYDE HOFFMAN,

any and all rights, title, and interest the defendant may have had in any of the property involved in or traceable to the offense alleged in Counts 1 and 2 of this Indictment is vested in the United States and is hereby forfeited to the United States pursuant to Title 18, United States Code, Section 2253.

If any of the property involved in or traceable to the offenses alleged in Counts 1 and 2 of this Indictment, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 2253.

JOHN C. GURGANUS
Acting United States Attorney



LUISA HONORA BERTI
Assistant United States Attorney

A TRUE BILL



FOREPERSON

2-4-25
Date